

## **REMARKS/ARGUMENTS**

Reconsideration and withdrawal of the rejections of the application are respectfully requested in view of the amendments and remarks herewith, which place the application into condition for allowance. The present amendment is being made to facilitate prosecution of the application.

### **I. STATUS OF THE CLAIMS AND FORMAL MATTERS**

Claims 1-6 are pending in this paper. Claim 7 has been canceled without prejudice or disclaimer of subject matter. No claims are amended in this paper.

### **II. REJECTIONS UNDER 35 U.S.C. §103(a)**

Claims 1-6 were rejected under 35 U.S.C. §103(a) over U.S. Patent No. 6,581,207 to Sumita (hereinafter, merely "Sumita") and in view of U.S. Patent No. 6,751,613 to Lee et al. (hereinafter, merely "Lee").

### **III. RESPONSE TO REJECTIONS**

Independent claim 1 recites, *inter alia*:

**...correcting means for correcting and adding variable notations in the search keyword space.** (Emphasis added)

A non-limiting exemplary explanation of these features is described in the Specification as:

[0108] The search keyword space correction section 261 corrects the generated search keyword space 43. **The correcting process specifically involves adding, as search-related keyword data, variable notations of the search keyword 41 making up the search keyword space 43 or of the search-related**

**keyword data. As examples of the variable notations to be added, "violin" and "biolin" are considered equivalent, and so are "A. Smith" and "A Smith." (emphasis added)**

The Office Action (see page 4) concedes that Sumita fails to disclose or render predictable the above-identified features of claim 1 and relies on S105 of Lee to reject “correcting means for correcting and adding variable notations in the search keyword space,” as recited in claim 1. Applicants respectfully disagree.

The cited portion of Lee describes:

If there exists a keyword KW satisfying equation 1 below, the keyword is additionally registered in the corresponding multimedia object management table (S 105 ).

$KW \in K - u$  and  $KW \notin K - m$  [1] (column 3, lines 53-60 of Lee)

As understood by Applicants, Lee describes two keyword spaces: keywords input by a user and keywords stored in a server’s management table. In order to expand the management table of the server, after a search is finished, S105 of Lee identifies **a keyword that is given by a user but is not included in a management table of a server**. After the identification, the identified keyword is added to the management table of the server.

Firstly, Applicants respectfully submit that Lee’s keyword is identified and selected from the keywords input by the user. The user’s keyword space has already included such a keyword. Therefore, it would be useless to add such a keyword back to the user’s keyword space that already has the same keyword. In contrast, claim 1 adds “variable notations”, in the search keyword space rather than a keyword that has been included in the search keyword space.

Furthermore, Applicants submit that the identified keyword of Lee is added to the **management table of the server after** a search is finished. The addition of Lee's keyword does not affect a current search. In contrast, the "variable notations" of claim 1 is added "**in the search keyword space**" and the corrected search keyword space is used by "**comparing means for comparing information in said content information space generated by said first generating means with information in said corrected search keyword space.**" Therefore, one result of the recited feature is, *inter alia*, that the addition of the "variable notations" expands a search result of the current search. Lee is deficient in the above-identified feature and hence cannot achieve, among other things, expanding the search result of the current search.

For at least the foregoing reasons Applicants submit that claim 1 is patentable.

As independent claims 5 and 6 are similar, or somewhat similar, in scope to claim 1, they are allowable.

As nothing in the prior art cited by the Office Action cures the above-identified deficiencies, Applicants respectfully request a reconsideration and withdrawal of the rejections.

#### IV. DEPENDENT CLAIMS

The other claims in this application are each dependent from one of the independent claims discussed above and are therefore believed patentable for at least the same reasons. As nothing in the prior art cited by the Office Action cures the above-identified deficiencies, Applicants respectfully request a reconsideration and withdrawal of the rejections. As each dependent claim is also deemed to define an additional aspect of the invention, however, the individual reconsideration of the patentability of each on its own merits is respectfully requested.

Similarly, because Applicants maintain that all claims are allowable for at least the reasons presented hereinabove, in the interests of brevity, this response does not comment on each and every comment made by the Examiner in the Office Action. This should not be taken as acquiescence of the substance of those comments, and Applicants reserve the right to address such comments.

### CONCLUSION


In the event the Examiner disagrees with any of statements appearing above with respect to the disclosure in the cited references, it is respectfully requested that the Examiner specifically indicate those portions of the references providing the basis for a contrary view.

Please charge any additional fees that may be needed, and credit any overpayment, to our Deposit Account No. 50-0320.

Applicants respectfully submit that all of the claims are in condition for allowance and request early passage to issue of the present application.

Respectfully submitted,

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